

IN The United State Federal District Court  
FOR The middle District of ALABAMA

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BILLY GAY ALLS  
A/S 161437

DEBRA P. HACKETT, CLK  
U.S. DISTRICT COURT  
MIDDLE DISTRICT OF ALA

DEBRA P. HACKETT, CLK  
U.S. DISTRICT COURT  
MIDDLE DISTRICT OF ALA

3:05-CV-1228-F

Petitioner

VS

Gwendolyn Moseley AIA.  
Respondent

MOTION FOR APPOINTMENT OF COUNSEL

Comes Now the Petitioner, Billy Alls, And move the Honorable Court For the Appointment of Counsel (Pursuant to 18 U.S.C. Sec. 3006A[G]) were this Honorable Court has Discretionary power to GRANT the Petitioner A Appointment of Counsel in A Collateral Petition Where Justice would be served.

The Petitioner contends that he has very little education And he know nothing About the Federal Procedure, And it would serve Justice in this case Where the Petitioner is trying to Prove that he is Actually Innocent of A Crime that he did not Committ, but Plead Guilty of the Charge because he Feared that he would be Put on death Row For A Crime he did not committ.

Petitioner AINS has No Education in matter of LAW And is INCARCERATED in AN Institution that does not Allow Inmate have contact With Inmate in other dorm. And ALSO Forbids AS A matter of Policy Inmates to Assist each other in legal matter under threat of DISCIPLINARY ACTIONS And loss of PRIVILEGES And being placed in segregation ALSO there is limited Access to AN Inadequate LAW LIBRARY (The hours ARE) 12 PM - 4 PM during YARD CALL (APP 1 hr) OR GYM CALL APP 2 hr For the Inmates Dorm Allegedly every other day ALSO From 6:00 PM till 7:00 PM For Inmates in Trade School OR Who Job Prohibits them being Able To be in the LAW LIBRARY during YARD CALL OR GYM CALL A limit of 14 Inmate ARE Allowed. ALSO There is Absolutely no one With ANY legal TRAINING to ASSIST These Inmate ASSISTANCE is forbidden by INSTITUTIONAL Policy A CLEAR VIOLATION OF 18 USC § 3006 A-(A)(B) C, J, A ALSO 21 USC 848(9)(4)(B) Plus 28 USC 2254, RULES N. 1 Rule 8(C) McBride v Sharpe 25 F3d 962 (11<sup>th</sup> CIR 1994) ALSO Bounds v Smith 436 US 817 And Avery v Johnson 393 US 483. ALSO BARNARD v Collins 13 F3d 87 (5<sup>th</sup> CIR 1994) And Weeks v Jones 100 F3d 124 (11<sup>th</sup> CIR 1997)

I DECLARE UNDER PENALTY OF PER JURY THAT  
THE FOREGOING IS TRUE AND CORRECT.

Executed on JANUARY 30 2006

Billy Jay All  
SIGNATURE OF AFFIANT

## Certificate of Service

I AVER that A TRUE AND CORRECT COPY OF THE AFORE GOING  
HAS BEEN SERVED UPON THE RESPONDENCE ATTORNEY BY  
PLACEING SAME IN THE LEGAL MAIL SYSTEM AT E.C.F.  
PROPERLY ADDRESSED AND POSTAGE PREPAID.

DONE ON THIS ~~THE~~ 30<sup>th</sup> DAY OF JANUARY 2006

Billy Alls  
Billy Alls

YVONNE A. H. SAXON  
TROY KING  
11 South Union Street  
MONTGOMERY, ALA. 36130